


KELLEY DRYE & WARREN LLP
A LIMITED LIABILITY PARTNERSHIP

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J.

April 3, 2025

The Honorable Vernon S. Broderick
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Date: April 7, 2025

Re: *The Nielsen Company (US), LLC v. TVSquared Ltd.*, C.A. No. 1:23-cv-01581-VSB-SN

Dear Judge Broderick:

Plaintiff The Nielsen Company (US), LLC, (“Nielsen”) and Defendant TV Squared Ltd. (“TVSquared”) respectfully submit this joint letter-motion pursuant to Your Honor’s Individual Rules & Practices in Civil Cases to request to extend the stay in this case for an additional sixty-seven (67) days, through and including June 10, 2025, and to extend all deadlines in the Scheduling Order as shown below. The parties agree that the stay will apply to all interim deadlines, including the service of and responses and objections to written discovery. This is the parties’ fourth request to extend an existing stay in the case, and eighth request for an extension of time. *See* Dkt. 135, 159, 171, 186, 191. The court granted the previous seven requests. Dkt. 137-138, 160-161, 172-173, 189-190. In support of this letter-motion, the parties provide the following specific reasons for the stay and extension requests:

The parties are continuing to work towards a mutually agreeable resolution to this lawsuit. Nielsen and TVSquared have exchanged a draft Letter of Intent regarding possible terms, with specific milestone dates included in the letter to assist in progressing towards an agreement. While the parties are diligently working to progress towards a resolution, including technical proof-of-concept work, the parties currently do not have sufficient time to complete their technical work and continue their negotiations without incurring substantial costs associated with the close of fact discovery and expert reports. The parties therefore request that the Court extend the existing stay in the case for an additional 67 days, and further permit the parties to extend all remaining deadlines by approximately 67 days to allow for additional time to hold further discussions in lieu of incurring further costs associated with the litigation.

A list of existing deadlines in the procedural schedule, along with the proposed adjusted deadlines, is included below.¹ A proposed order reflecting these revised dates is attached hereto as Exhibit A.

| ITEM | CURRENT DATE | PROPOSED DATE |
|---|--------------|-------------------|
| Deadline to serve any interrogatories or requests for admission | June 3, 2025 | August 8, 2025 |
| Close of fact discovery | July 1, 2025 | September 5, 2025 |

¹ In the event the parties are unable to resolve the case, Nielsen intends to ask the court to extend these deadlines further to give the parties more time to complete discovery. Nielsen has agreed to the proposed dates in this letter only to avoid a dispute that could unduly burden the court while the parties engage in good faith settlement discussions.

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| ITEM | CURRENT DATE | PROPOSED DATE |
|--|--------------------|-------------------|
| Opening expert reports by party with burden of proof | August 19, 2025 | October 24, 2025 |
| Responsive expert reports by party without burden of proof | September 23, 2025 | December 5, 2025 |
| Close of expert discovery | November 11, 2025 | January 24, 2026 |
| Joint letter to court regarding dispositive motions | December 2, 2025 | February 10, 2026 |
| Telephonic post-discovery teleconference | December 16, 2025 | February 23, 2026 |

Respectfully submitted,

/s/ Jason P. Greenhut

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